

SCHOOL MEDICAL ADMINISTRATIVE ACTIVITIES PROGRAM
PROGRAM IMPLEMENTATION CONCERNS RAISED BY CDE/SCHOOL ASSOCIATIONS
UPDATED JANUARY 24, 2014

Appeals Process

LEAs requested that an appeals process be developed that allows LEAs to submit an appeal to DHCS when they disagree with a decision made by their LEC or LGA.

DHCS Response: DHCS agrees with the suggestion and will add it to the agenda for the stakeholder forum in February. While there is an appeals process in place now, it is broad-based and does not define the steps a school district should take to appeal a decision. Therefore, DHCS will develop specific steps that school districts can follow to have their concerns addressed timely by DHCS. The Department will implement the appeals process through a policy letter that will be effective no later than July 1, 2014.

Classification Justifications

The associations and CDE were concerned that participants in the SMAA program would be limited to the list noted in the plan, without an opportunity to amend that list in cases where school have unique classifications for personnel performing SMAA functions. .

The associations and CDE shared concerns about a letter that the San Bernardino and Fresno LGAs sent to their LEAs about the deferral process. This letter stated that the LEAs would not be allowed to use the exception process delineated in DHCS' deferral policy which would mean that the districts' unique classifications would not be considered as allowable classifications for the purposes of SMAA and therefore their SMAA activities would not count as allowable moments for coding purposes.

DHCS Response: DHCS has included an exception process to this requirement that allows LEAs to submit documentation justifying alternate participant classifications for participation in SMAA. The intent of the exception process is to ensure LEAs are able to claim appropriate MAA activities, whether done by a common participant classification or a classification specific to the LEA. This ensures that the new classifications are part of the list of participants who are able to submit allowable moments to the LGAs under RMTS for those moments to be considered in the coding process.

In the case of San Bernardino and Fresno LGAs, DHCS is currently working to ensure they are complying with the exceptions policy and that the LEAs have the opportunity to use the exception process for including classifications in their program.

Stakeholder Groups

The associations and CDE asked for a forum for more transparent communication.

DHCS Response: DHCS will begin hosting SMAA stakeholder forums in February of 2014. The purpose of the stakeholder group is to provide a forum for the discussions of issues/concerns, create a more open environment, and to enhance DHCS communication with our Stakeholders. DHCS is currently soliciting participation in the forum through the SMAA webpage and targeted emails.

RMTS Contract Concerns

The draft SMAA implementation plan requires LECs and LGAs obtain an RMTS system through a competitive bid process. The plan also required RMTS vendors to have three to five years of experience administering an RMTS system. The associations and CDE were concerned that no California vendor would be able to bid because they do not have the experience.

DHCS Response: DHCS removed the three to five year requirement and instead require the vendors to have experience working with the SMAA program. All parties at the meeting agreed to this language.

Communication Issues Between the LEAs and the LECs/LGAs.

The group brought up concern that the LECs and LGAs were not appropriately communicating with the school districts.

DHCS Response: At the meeting, we committed to having conversations with the LECs and LGAs about these concerns and work proactively on ensuring that the communication channels between the two entities are improved.

Concern over Reimbursement to Rural Schools

Group brought up concern over the belief that rural school districts would be negatively impacted by the grouping with larger school districts for the purpose of RMTS coding.

DHCS Response: The department emphasized the fact that we have had conversations with other States and have done our own statistical analysis, all of which proves that schools in rural areas will in fact potentially benefit from such grouping. We committed to closely monitoring this and other issues and alter the plan in the future if necessary.

Process Transparency/Data Sharing

School administrators have raised concerns about the fact that having the LECs/LGAs do the coding for the individual schools will not allow the schools access to the information necessary for them to ensure that their data was coded appropriately.

DHCS Response: DHCS will include a provision in the SMAA implementation plan that certain reports, including reports that delineate coding, are built into the RMTS software system and are available to the LECs/LGAs as well as DHCS. These reports will be shared with the LEAs. DHCS will work with the LEAs and the LECs/LGAs to ensure there is transparency in this process. Also, DHCS will train the coders and monitor the coding. DHCS retains the authority to override a coding decision if we determine that the original code was an error. Given that DHCS will share reports with the LEAs, the LEAs will be able to be part of the review process.

Coding Issues

Under the current method, SMAA participants fill out paper time surveys in which they state the amount of time they spent on MAA activities and non-MAA activities. Under the RMTS method of time surveying, the participants will receive a questionnaire that asks what they are doing at a specified time. That information will be sent to the LECs/LGAs, who will code the answer to MAA billable or MAA non-billable codes. This will be the basis for claiming federal funds.

The association and CDE are concerned that schools will be liable for incorrect coding by LECs/LGAs, negatively impacting their claiming or requiring them to pay back monies if they are audited by the federal government.

DHCS's concern is that if LEAs are allowed to code, there is a high risk of continued inconsistent and inflated coding, resulting in possible future deferrals and audit findings, potentially putting the entire program at risk.

Placing the coding responsibility at the LEC/LGA level allows for a more independent, impartial review of the RMTS responses and eliminates any potential conflict of interest. LECs/LGAs charge the LEAs a flat fee not a percentage based fee and have no financial incentive to have LEAs receive a higher reimbursement.

DHCS Response: To ensure fiscal and programmatic integrity, DHCS continues to support the policy that coding is done by the RMTS administrators at the LEC/LGA level. We shared with the group that DHCS is committed to a thorough and ongoing training of coder employees and will be conducting oversight activities to ensure appropriate and consistent coding is done statewide.